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LODGE 190, LOCAL LODGE 1546, AFL-CIO, AND  
INTERNATIONAL ASSOCIATION OF MACHINISTS AND  
AEROSPACE WORKERS, DISTRICT LODGE 190, LOCAL  
LODGE 1414, AFL-CIO

UNITED STATES OF AMERICA  
NATIONAL LABOR RELATIONS BOARD

EVERPORT TERMINAL SERVICES

and

INTERNATIONAL ASSOCIATION OF  
MACHINISTS & AEROSPACE WORKERS,  
DISTRICT LODGE 190, LOCAL LODGE 1546,  
AFL-CIO AND INTERNATIONAL ASSOCIATION  
OF MACHINISTS AND AEROSPACE WORKERS,  
DISTRICT LODGE 190, LOCAL LODGE 1414,  
AFL-CIO

and

INTERNATIONAL LONGSHORE AND  
WAREHOUSE UNION

and

INTERNATIONAL ASSOCIATION OF  
MACHINISTS & AEROSPACE WORKERS,  
DISTRICT LODGE 190, LOCAL LODGE 1546,  
AFL-CIO, AND INTERNATIONAL ASSOCIATION  
OF MACHINISTS AND AEROSPACE WORKERS,  
DISTRICT LODGE 190, LOCAL LODGE 1414,  
AFL-CIO

Case 32-CA-172286

Case 32-CB-172414

**MOTION TO STRIKE  
RESPONDENT'S  
INTERNATIONAL LONGSHORE  
AND WAREHOUSE UNION'S  
JOINDER IN RESPONDENT  
EVERPORT TERMINAL  
SERVICES, INC.'S EXCEPTIONS  
AND SUPPORTING BRIEF**

The International Longshore and Warehouse Union (“ILWU”) has filed a brief which is 36 pages in length. That is permissible. The Board’s rules do not contemplate or permit appendices. There are approximately 26 pages of appendices. Even considering part of them to be incorporated in the brief, this still exceeds the 50 page limit imposed by the Board’s Rules and Regulations. The Brief should be rejected.

Dated: November 6, 2018

Respectfully submitted,

WEINBERG, ROGER & ROSENFELD  
A Professional Corporation

By: /s/ David A. Rosenfeld  
DAVID A. ROSENFELD

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## PROOF OF SERVICE

I am a citizen of the United States and resident of the State of California. I am employed in the County of Alameda, State of California, in the office of a member of the bar of this Court, at whose direction the service was made. I am over the age of eighteen years and not a party to the within action.

On November 6, 2018, I served the following documents in the manner described below:

**MOTION TO STRIKE RESPONDENT'S INTERNATIONAL LONGSHORE AND  
WAREHOUSE UNION'S JOINDER IN RESPONDENT EVERPORT TERMINAL  
SERVICES, INC.'S EXCEPTIONS AND SUPPORTING BRIEF**

- ☒ (BY ELECTRONIC SERVICE) By electronically mailing a true and correct copy through Weinberg, Roger & Rosenfeld's electronic mail system from [kkempler@unioncounsel.net](mailto:kkempler@unioncounsel.net) to the email addresses set forth below.

On the following part(ies) in this action:

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I declare under penalty of perjury under the laws of the United States of America that the foregoing is true and correct. Executed on November 6, 2018, at Alameda, California.

/s/ Karen Kempler  
Karen Kempler